

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Briess Malt & Ingredients Company
605 Washington Street
Manitowoc, Wisconsin 54220**

ATTENTION:

**Dave Luckow
Plant Manager
Dave.luckow@briess.com**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Briess Malt & Ingredients Company (Briess or you) to submit certain information about the facility at 605 Washington Street, Manitowoc, Wisconsin (the Facility). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 45 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Briess owns and operates an emission source at the Manitowoc, Wisconsin facility. We are requesting this information to determine whether your emission source is complying with the Clean Air Act and Wisconsin State Implementation Plan.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Briess to upload all required information to the secured web-link shared with you

at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Emma Leeds at leeds.emma@epa.gov or Brianna Fenzl at fenzl.brianna@epa.gov to make arrangements to submit your response.

Briess must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Briess to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Emma Leeds at leeds.emma@epa.gov or Brianna Fenzl at fenzl.brianna@epa.gov.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. “Facility” shall include those structures and emission units located at 605 Washington Street, Manitowoc, Wisconsin.
2. “Title V permit” refers to Wisconsin Department of Natural Resource Operation Permit No. 4360372A-P42, issued to Briess on October 6, 2021.

Appendix B

Information You Are Required to Submit to EPA

Briess must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within 30 calendar days after your receipt of this request.

1. Provide a narrative description and schematic diagram of all processes and air pollution control equipment at the Facility. For each process, describe input materials, process, operating parameters, products formed, maximum production rate, and if/how air emissions are controlled and/or limited.
2. Provide a copy of each current air permit issued to Briess for the Facility by the Wisconsin Department of Natural Resources (WDNR) since June 1, 2012, including, but not limited to, operating permits, construction permits, and permit amendments or revisions.
3. Provide a copy of all permit applications submitted to WDNR for the Facility since June 1, 2012. If outside this date range, provide permit application containing initial Latest Available Control Technology (LACT) analysis for the roasters with discussion of technical feasibility and determination of 75% control of volatile organic compound (VOC) emissions from the roasters.
4. For each emission unit, including, but not limited to, each steeping unit, germination bed, kiln, and roaster, provide:
 - a. The date (month, day, and year) of installation;
 - b. The date of initial operation;
 - c. For each emission unit modification (if applicable):
 - i. The commencement and completion date of the modification;
 - ii. A description of the modification;
 - iii. The impact of the modification on throughput; and
 - iv. The impact of the modification on emissions.
5. Provide a list of all emissions tests conducted at the Facility for any reason, from January 1, 2012, to date of receipt of this Request for Information (RFI), and provide copies of all emissions test reports. Emission testing includes, but is not limited to, compliance testing, capture efficiency testing, destruction efficiency testing, engineering testing, and testing for general information. Use the following guidelines for compiling the list and preparing copies of the stack test reports:
 - a. **For the list, in an electronic spreadsheet format:**
 - i. Identify the emissions unit tested, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (e.g., before or after emission unit or air pollution control device), the

- production rate of the associated emission unit, the pollutants measured, and the value (with units) of each set point and operating parameter established during the test;
 - ii. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with WDNR.
 - b. **Copies:** Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
- 6. The Facility's Title V Permit includes three malt types for the VOC compliance demonstration at roasting operations. These malt types are: black malt; medium dark malt; and green malt and lighter roasted products. Document the operating parameters at each emission unit and/or material qualities the Facility uses to establish the different malt types at roasting for regulatory purposes. This may include but is not limited to steeping time, germination time, kiln residence time and temperature, roasting time and temperature, and material moisture at each stage of production.
- 7. For the period from January 1, 2018, to the date of receipt of this RFI, provide the total malt produced in pounds per day (lb/day) and pounds per month (lb/mo).
- 8. Provide potential-to-emit (PTE) and maximum theoretical emission (MTE) calculations for criteria pollutants and hazardous air pollutants (HAPs) for each emission unit at the Facility. This shall include, but is not limited to, steeping, germination, kilning, and roasting processes. Include the following information:
 - a. Emission factors used, technical data supporting each emission factor, and basis for using each emission factor;
 - b. The airflow to the atmosphere of each emission unit; and
 - c. A description of any physical design and operational limitations taken into account in PTE and MTE calculations.
- 9. For the period from January 1, 2018 to the date of receipt of this RFI, provide an electronic spreadsheet with the following data related to roasting operations at the Facility:
 - a. Daily and monthly production in dry pounds per day and dry tons per month at each roaster, broken out by type of malt produced;
 - b. For each batch of roasted malt, provide documentation supporting the malt type classification, i.e., black malt, medium dark malt, or green malt and lighter roasted products; and,
 - c. Monthly total VOC emission calculations, calculated according to the Title V Permit.
- 10. Provide the average moisture content, taken over the previous 12 months, of the following:

- a. Barley during steeping operations;
 - b. Barley during germination operations;
 - c. Green malt during kiln drying; and,
 - d. Green malt, medium dark malt, and black malt during roasting.
- 11. Provide the dates and hours of operation of the roaster afterburner from the date of construction to the date of receipt of this RFI. If no longer used, indicate the final date of operation of the unit.
- 12. For all baghouses, if available, provide the following information from June 1, 2018 to the date of receipt of this RFI:
 - a. Pressure drop measurements, taken once every 8 hours the source is in operation or once per day of operation; and,
 - b. Records of quarterly internal visual inspections of baghouses C12, C15, and C18.
- 13. For Controls C49 through C56, provide the following information from January 1, 2018 to the date of receipt of this RFI:
 - a. Records of measurements of operating pressure drop across each C49-C56;
 - b. Records of inspections, maintenance, or repairs for Controls C49 through C56; and,
 - c. Records of monitoring visible emissions;

Appendix C

Information You Are Required to Submit to EPA

Emissions Testing

Briess must respond to this information request by performing testing at its facility located at 605 Washington Street, Manitowoc, WI, pursuant to Section 114(a) of the CAA, U.S.C. § 7414(a). Briess must submit a test protocol, conduct testing, and submit all other information requested in accordance with the schedule specified below.

Submit Testing Protocol(s)	Within 45 days of receipt of this request
Notification of Intent to Test	No later than 14 days prior to testing
Complete Testing	Within 30 days of receipt of approval of the Test Protocol
Submit Testing Report	Within 30 days of completion of testing

1. Upon EPA approval of the Test Protocol, Briess must perform emissions testing at the Facility to determine:
 - a. At the stack(s) for the germination beds on either Malthouse 1, 2, 3, 4, or 6, quantify the mass emission rate of volatile organic compounds (VOCs) as total VOCs. The mass emission rates shall be determined by performing testing using combinations of the following EPA Reference Methods (or other methods subject to EPA approval): Methods 1-4, Method 18, Method 25/25A, and Method 320.
 - b. At either Roaster P49, P50, P51, or P52, quantify the mass emission rate of volatile organic compounds (VOCs) as total VOCs for green malt, medium malt, and black malt roasting (separately). The mass emission rates shall be determined by performing testing using combinations of the following EPA Reference Methods (or other methods subject to EPA approval): Methods 1-4, Method 18, Method 25/25A, and Method 320.
2. Prior to conducting the performance testing requested in Item 1(a) and 1(b), the Facility shall perform a pre-survey at roasting and germination to identify the VOCs present in the gas stream. The results of the pre-survey shall be included in the test protocol and shall be used to determine the appropriate test methods used to determine the total VOCs emissions at germination and roasting.

3. During the testing conducted pursuant to Item 1(a) and (b) above, Briess shall operate the germination beds and roaster at their maximum production rates (greater than 95% capacity). All other process equipment shall be operating under conditions representative of normal operations.
4. During the testing conducted pursuant to Item 1(a) above, Briess shall monitor and record the operating parameters for the germination process, including percent humidity within the germination room.
5. During the testing conducted pursuant to Item 1(b) above, Briess shall monitor and record the operating parameters for the roasting process, including temperature in the roasters, type of malt (green, medium, and black), and pounds of malt in the roasters.
6. Within 45 days after receipt of this request, Briess shall submit to EPA the proposed testing protocol(s) that completely describes the methods and procedures for testing at each unit, including all relevant operating parameters. Briess shall conduct the required testing under a protocol approved in advance by EPA. The protocol shall address the requirements of Items 1-5 of this information request. With the protocol(s), provide production data from the preceding 12 months to demonstrate that the maximum production rate will be achieved during the testing. Submit the protocol by email to Emma Leeds at leeds.emma@epa.gov and Brianna Fenzl at Fenzl.brianna@epa.gov.
7. At least 14 days prior to the planned test date(s), Briess shall submit notification to EPA of its intent to perform emission testing. Submit this notice by e-mail to the addresses above. Such testing shall be completed within 30 days of approval of the Test Protocol.
8. Within 30 days after completion of the tests required by this information request, submit a complete report of the emissions testing, including, at a minimum, the following:
 - a. Summary of Results
 - i. Results of the above specified emission tests:
 1. For the germination beds, VOC results in pounds total VOCs per hour and pounds total VOCs per ton of dried barley, and
 2. For the roaster, VOC results in pounds total VOCs per hour and pounds total VOCs per ton of malt for each malt type.
 - ii. Discussion of response factors, molecular weight corrections, or any other factors used to convert raw data into the reported results (including a definition of any terms such as "response factor" that can be used to describe multiple types of corrections);
 - iii. Process and control equipment data related to determining compliance;
 - iv. Discussion of test errors; and
 - v. Discussion of any deviations from the reference test methods.
 - b. Facility Operations
 - i. Description of the process equipment in operation;
 - ii. Operating parameters of the process units and related equipment at the time of the test;

- iii. Facility operating parameters that demonstrate that the process units were operated at maximum production rates at the time of the test;
 - iv. Supporting documentation to confirm that each malt type was produced at roasting; and,
 - v. Discussion of any deviations from operating procedures.
- c. Sampling and Analytics Procedures
 - i. Sampling port location(s) and dimensions of cross-section;
 - ii. Sampling point description, including labeling system;
 - iii. Brief description of sampling procedures, including equipment and diagram;
 - iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 - v. Brief description of analytical procedures, including calibration;
 - vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 - vii. Quality control/ quality assurance procedures, tests, and results.
- d. Appendix
 - i. Complete results with example calculations;
 - ii. Raw field data (original, not computer printouts);
 - iii. Laboratory report, with signed chain-of-custody forms;
 - iv. Calibration procedures and results;
 - v. Raw process and control equipment data, signed by plant representative;
 - vi. Test log;
 - vii. Project participants and titles; and
 - viii. Copies of correspondence relating to the testing.